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OF COUNSEL
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October 9, 2014

Maher v Quality Bus

Our File No.: 149.29644

Docket No.: 14 CV 3586 (JCM)

Via ECF/CMS Only

Magistrate Judge Judith C. McCarthy
United States District Court
Southern District of New York
300 Quarropas Street, Courtroom 421
White Plains, New York 10601

Dear Judge McCarthy:

I represent the defendant Quality Bus Service, LLC (“Quality”), in the above referenced action. I write in response to plaintiff’s counsel’s letter application dated October 8, 2014 (Doc. 28). Plaintiff seeks the disclosure of co-defendant Caitlin H. Railo’s personnel and medical records maintained by Quality. Because those records include confidential information, Quality requests that the plaintiff obtain an authorization from Railo, or an Order from the Court, authorizing/directing disclosure. Quality has no other objection to the disclosure of those records.

Regarding the remainder of the plaintiff’s document demands, inquiry has been made with our client regarding what documents, if any, it possess which are responsive. Upon receipt of those documents, a supplemental response will be forthcoming. To the extent that any documents are withheld under an asserted privilege, Quality will provide a privilege log. Accordingly, it is respectfully submitted that it would be premature for the Court to render a determination on those remaining demands at this time. Thank you.

Respectfully submitted,

MAYNARD, O'CONNOR, SMITH & CATALINOTTO, LLP

By

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MCJ/mla

cc: Evan Foulke (*via ECF/CMS*)
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